

# Exhibit 1

*Brian K. Reinbold Sr.*

3909 Delaware Street  
Marshallton, DE 19808-3709  
Phone (302) 683-9242  
Cell (302) 753-4827  
[BKR0822@jolt.com](mailto:BKR0822@jolt.com)

July 25, 2005

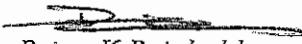
Cohen, Weiss and Simon LLP  
Attn: Oriana Vigliotti  
330 West 42<sup>ND</sup> Street  
New York, N.Y. 10036-6976

Re: Brian K Reinbold vs. NALC Branch 191 & USPS  
US District Court Case # 05-47GMS

Dear Ms. Vigliotti

Please find attached the answer to you Interrogatories and Documents request for NALC Branch 191 dated June 29, 2005.

Sincerely,

  
Brian K Reinbold

Sent via certified mail # 7004 1160 0006 3104 1758 w/return receipt on July 26, 2005

Cc: USAG Patricia Hannigan  
via certified mail# 7004 1160 0006 3104 1833 w/ return receipt  
On July 26, 2005

file

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*Exhibit 1*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

BRIAN K REINBOLD  
Plaintiff,

vs.

Civil Action Number  
~~05-047~~ GMS

NALC BRANCH 191 & USPS  
Defendant

**RESPONSE TO DEFENDANTS SET OF INTERROGATORIES**  
**DATED JUNE 29, 2005**

ANSWER TO QUESTION 1:

Keith Jordon  
USPS Letter Carrier  
Vice-President/Shop Steward NALC Local 191  
Wilmington, DE

Bob Wilkerson  
USPS Letter Carrier  
NALC Local 191 President  
Wilmington, DE

Chris Cambell  
USPS Letter Carrier  
Shop Steward NALC Local 191  
Wilmington, DE

Jeff Cushner  
USPS Letter Carrier  
Shop Steward NALC Local 191  
Wilmington, DE

Jim Surfey  
NBA Rep. Region 13  
NALC  
Virginia Beach, VA

# Exhibit 1

Dick Gentry  
NBA Agent Region 13  
NALC  
Virginia Beach, VA

William Young  
President NALC  
Washington, DC

Tim Dowdy  
NBA Agent Region 13  
NALC  
Virginia Beach, VA

Gary Mullins,  
Vice-President NALC  
Washington, DC

Fred Rolando  
Director of City Delivery NALC  
Washington, DC

Kevin Burns  
Carrier Supervisor USPS  
Wilmington, DE

Jeff Cushner  
Shop Steward NALC Local 191  
Wilmington, DE

Vincent Sorbotto  
President (RETIRED) NALC  
Washington, DC

Yolanda Moore Hankerson  
Branch Manager, Rodney Square  
Wilmington, DE

Senator Joseph R. Biden Jr.  
For the State of Delaware  
Wilmington, DE

Russell Olive Jr.  
NALC Step B Representative  
Bellmawr, NJ

*Exhibit 1*

Edward DiDomenico  
USPS Step B Representative  
Bellmawr, NJ

Rose King  
Shop Steward NALC Local 191  
Wilmington, DE

Kevin Martin  
Shop Steward NALC Local 191  
Wilmington, DE

Mike Margis  
Shop Steward NALC Local 191  
Wilmington, DE

Bob Lewis  
Shop Steward NALC Local 191  
Wilmington, DE

Denise Royster Simms  
Carrier Supervisor USPS  
Wilmington, DE

Ed Gonzalez  
Carrier Supervisor USPS  
Wilmington, DE

Ed Carpenter  
Carrier Supervisor USPS  
Wilmington, DE

Alexander Lazaroff  
Eastern Area Vice-President  
Pittsburgh, PA

Doug Shiflet  
Postmaster  
Wilmington, DE

*Exhibit 1*

Senator Tom Carper  
For The State of Delaware  
Wilmington, DE

Joanna Korker  
District Manager South Jersey District  
Bellmawr, NJ

Isaacce Morris  
Labor Relations  
New Castle, DE

Mike Brose  
District Manager South Jersey District  
Bellmawr, NJ

Dennis Money  
Carrier Supervisor USPS  
Wilmington, DE

Eileen Muzzi  
Station Manager  
Wilmington, DE

Frank Rendon  
Carrier Supervisor USPS  
Wilmington, DE

Greg Vandervear  
USPS Rep.  
Wilmington, DE

Rick Calpaldo  
Carrier Supervisor USPS  
Wilmington, DE

John Potter  
Postmaster General  
Washington, DC

Paul Spadaro  
Shop Steward NALC Local 191  
Wilmington, DE

*Exh. b. + 1*

Ken Borlin  
Station Manager  
Wilmington, DE

Steve Gerber  
Carrier Supervisor USPS  
Wilmington, DE

Carla Rodgers  
Carrier Supervisor USPS  
Wilmington, DE

All Letter Carriers  
Employed at Lancaster Avenue  
In 2004

All Mail Handlers and Clerks  
Employed at Lancaster Avenue  
In 2004

**ANSWER TO QUESTION 2:** PTF Letter Carrier January 2001-May 2001 Newark, DE  
PTF Letter Carrier May 2001-December 2004 Wilmington, DE

**ANSWER TO QUESTION 3:** Grievances were not filed in timely manner, agreements between NALC & USPS were not honored by the USPS, notices from USPS for discipline referenced wrong grievances, Grievances were not appealed, NALC & USPS did not use facts and all information at Step B to render a decision, NALC & USPS chose to ignore all facts and all information at Step B to render a decision, NALC & USPS violated the National agreement between the two parties on a weekly and daily basis, NALC & USPS knowingly let harassment against my self continue with no regard

**ANSWER TO QUESTION 4:** October 27, 2004 for Failure to Follow Instructions

**ANSWER TO QUESTION 5:** loss of all back pay with pay raises, health insurance cost, seniority, vacation, sick leave and benefits from removal till case end

The above question where answered to the best of my ability.

*[Signature]*  
Brian K Reinbold  
Plaintiff  
July 25, 2005

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

BRIAN K REINBOLD  
Plaintiff,

vs.

Civil Action Number  
05-047 GMS

NALC BRANCH 191 & USPS  
Defendant

**RESPONSE TO DEFENDANTS DOCUMENT REQUEST  
DATED JUNE 29, 2005**

Please find attached all documents that answer your request 1-7

I believe I have supplied all documents in my possession  
and have answered all request to the best of knowledge.

*[Signature]*  
Brian K Reinbold  
Plaintiff  
July 25, 2005

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

**BRIAN K REINBOLD**

**Plaintiff,**

**vs.**

**Civil Action Number  
05-047 GMS**

**NALC BRANCH 191 & USPS**

**Defendant**

**NOTICE OF SERVICE**

I hereby state that a response to the above defendants for there Interrogatories and Document Request dated June 29,2005 was sent in a prepaid envelope And then certified with a return receipt certified # 7004 1160 0006 3104 1758 on July 26, 2005 to Cohen, Weiss and Simon LLP Mrs. Oriana Vigliotti 330 west 42<sup>nd</sup> Street, New York, NY 10036-6976

*[Signature]*  
**Brian K Reinbold**  
**Plaintiff**  
**July 25,2005**

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

BRIAN K REINBOLD

Plaintiff,

vs.

Civil Action Number  
05-047 GMS

NALC BRANCH 191 & USPS

Defendant

NOTICE OF SERVICE

I hereby state that a response to the above defendant NALC 191 for there  
Interrogatories and Document Request dated June 29,2005 was sent to the USPS  
attorney in a prepaid envelope

And then certified with a return receipt certified # 7004 1160 0006 3104 1833 on  
July 26, 2005 to Attn: Patricia Hannigan US Attorney General 1007 Orange Street  
Suite 700 P.O. Box 2046 Wilmington, DE 19899-2046

  
Brian K Reinbold  
Plaintiff  
July 25,2005